



Wellness International Network, Ltd.

5800 Democracy Drive • Plano, Texas 75024 • www.winltd.com

August 28, 2003

Office of Special Nutritional (HFS-450)
Center for Food Safety and Applied Nutrition
U.S. Food and Drug Administration
200 C Street S.W.
Washington D.C. 20204

RECEIVED
SEP 11 2003

Re: Notification for Statements on Dietary Supplement Labeling

This notification is being filed on behalf of Wellness International Network, Ltd., a distributor of dietary supplement products (hereinafter "WIN"). Its business address is: 5800 Democracy Drive, Plano, TX 75024. This notification is being made pursuant to Section 6 of DSHEA and 21 C.F.R. § 101.93. The dietary supplement product on whose label or labeling the statements appear is Food For Thought.

A. Food For Thought Dietary Supplement

The text of each structure-function statement for which notification is now being given is:

- Statement 1: Food For Thought further enhances its effectiveness through the utilization of essential vitamins – required for promoting the synthesis of brain neurotransmitters – with a unique blend of minerals.
- Statement 2: For added nutritional support, mix Food For Thought and Winrgy together.
- Statement 3: Get the most out of your neurological functioning.
- Statement 4: Food For Thought nutrients important for mental fitness.
- Statement 5: Excellent when combined with Winrgy, Food For Thought is ideal for work, school or anytime performance is needed.
- Statement 6: Nutrients for mental fitness
- Statement 7: By utilizing such scientifically established "smart nutrients" as Choline, Thiamin and Riboflavin, Food For Thought™ delivers to the body essential vitamins and minerals which promote the synthesis of brain neurotransmitters.
- Statement 8: By utilizing scientifically established "smart nutrients," Food for Thought™ is ideal for work, school or any time peak mental performance is desired.

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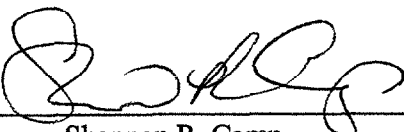
- Statement 9: Choline-enriched Food for Thought delivers to the body essential minerals and vitamins which promote the synthesis of brain neurotransmitters.
- Statement 10: Choline, a member of the B-complex family, is determined to be one of the few substances that possesses the ability to penetrate the blood-brain barrier and go directly into the brain cells to produce acetylcholine.
- Statement 11: Choline-enriched Food For Thought also contains mental fitness vitamins B3, B6, B1, B5 and C.
- Statement 12: Good source of choline
- Statement 13: Choline, B5 and Thiamin work synergistically to help your brain make acetylcholine, a neurotransmitter most associated with memory, attentiveness, and muscular coordination..
- Statement 14: Contains 770 mg of choline per serving, which is 140% of the Daily Value for choline (550 mg).
- Statement 15: Some of the choline in your diet is used by your brain to make acetylcholine, the neurotransmitter most associated with memory, concentration, and good muscle tone.
- Statement 16: Food For Thought is an excellent way to get your choline and the nutrient co-factor vitamin B5 to help the brain convert choline to acetylcholine.
- Statement 17: Promotes acetylcholine production
- Statement 18: Acetylcholine helps control muscle tone, learning, and primitive drives and emotions, while also controlling the release of the pituitary hormone vasopressin – which is involved in learning and in the regulation of urine output.
- Statement 19: The most abundant neurotransmitter in the body, acetylcholine, is the primary neurotransmitter between neurons and muscles.
- Statement 20: Acetylcholine is vital because of its role in motor behavior (muscular movement) and memory storage.
- Statement 21: The brain uses vitamins B3 and B6 to convert the amino acid L-tryptophan into the mood- and sleep-regulating neurotransmitter serotonin
- Statement 22: Vitamins B1, B5, B6 and C, and the minerals zinc and calcium are required for the production of acetylcholine.

B. The following summary identifies the dietary ingredient(s) or supplement(s) for which a statement has been made:

<u>Statement Number</u>	<u>Identity of Dietary Ingredient(s) or Supplement that is the Subject of the Statement</u>
1.	Food For Thought
2.	Food For Thought
3.	Food For Thought
4.	Food For Thought
5.	Food For Thought
6.	Food For Thought
7.	Choline, Thiamin and Riboflavin
8.	Choline, Thiamin and Riboflavin
9.	Choline
10.	Choline
11.	Choline, vitamins B3, B6, B1, B5 and C.
12.	Choline
13.	Choline, B5 and Thiamin
14.	Choline
15.	Choline
16.	Choline, B5
17.	Choline
18.	Acetylcholine
19.	Acetylcholine
20.	Acetylcholine
21.	vitamins B3, B6, L-tryptophan
22.	Vitamins B1, B5, B6 and C, and the minerals zinc and calcium

I certify that the information presented and contained in this Notification is complete and accurate, and that WIN has substantiation that each structure-function statement is truthful and not misleading.

Date Signed: 8/28/03

By: 
Shannon R. Camp
Director of Communications